



Garson, Segal, Steinmetz, Fladgate LLP

Robert Garson ◊  
Michael Steinmetz \* ∞ □  
Chris Fladgate °  
Thomas Segal ^

Stephen Greenwald  
John Lane ∞  
Timothy Kendal ◊  
Ilan Ben Avraham ▽

Kevin Kehrli  
Morgan Romagna  
Jacob Pargament  
Maddie Brown

Tel: +1 (212) 380-3623  
Fax: +1 (347) 537-4540

Additional Bar  
Memberships  
◊ England and Wales  
^ Paris  
\* New Jersey

∞ Patent Bar  
° Victoria (Australia)  
▽ Israel  
□ Colorado

Email: [jep@gs2law.com](mailto:jep@gs2law.com)

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

October 8, 2020

**Re: *LG Capital Funding, LLC v. E-Waste Systems, Inc.* (20-cv-04474(PGG))**  
**Request to Adjourn October 15, 2020 Initial Conference**

Dear Judge Gardephe:

This firm represents LG Capital Funding, LLC (“Plaintiff”) in the above captioned action. I write to request an adjournment *sine die* of the Initial Conference scheduled for October, 2020 at 11:00 a.m.

On September 9, 2020, a Clerk’s Certificate of Default as to E-Waste Systems, Inc. (“Defendant”) was issued in this case due to Defendant’s failure to respond to Plaintiff’s complaint. Dkt. 11.

Plaintiff intends to file an Order to Show Cause for default judgment and will do so promptly. As Defendant has not appeared or otherwise responded in this matter, consent was not given. Therefore, Plaintiff respectfully requests an adjournment *sine die* of the scheduled Initial Conference.

Respectfully submitted,

/s/  
Kevin Kehrli

**Memo Endorsed:** The October 15, 2020 conference is adjourned sine die. Plaintiff is instructed to move for default by October 23, 2020.

SO ORDERED.

Paul G. Gardephe  
United States District Judge

Dated: October 9, 2020

USA: 164 WEST 25<sup>TH</sup> STREET, 11<sup>TH</sup> FLOOR, NEW YORK, NY 10001  
UK: 2 BEDFORD ROW, LONDON WC1R 4BU  
WWW.GS2LAW.COM